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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE,

STEVE PANDI AND EILEEN A QUEZADA

DEBTORS.

) IN PROCEEDINGS UNDER CHAPTER 7  
) Case No.: 2:16-BK-11585-SHG

)  
) SUPPLEMENT TO RESPONSE TO  
)  
) OBJECTION TO CLAIM OF GEORGE  
)  
) PANDI REGARDING NEWLY  
)  
) DISCOVERED FACTS.

George Pandi ("Pandi") hereby submits newly discovered facts relevant to his Response to the Objection to his proof of claim by Objectors SAMT 2009 LLC et. al. ("Objectors")

On August 28, 2017, Eric Haley, the Chapter 7 Trustee in this case, responded to an email I sent him. See Exhibit 1. Mr. Haley informed me that there is only about \$7000 in the estate for distribution to creditors, and that he is not seeking any further assets to add to the estate. He told me that this would all go to the IRS. I checked the Claims Register and IRS has indeed filed a secured/priority proof of claim in the amount of \$956,080.40.

Thus, there will be on distribution to any unsecured creditor, including myself or Objectors. These creditors therefore have no standing to object to my claim as they will not be receiving any distribution. I, along with my son Tom Pandi, are engaged in state court litigation with Objectors. Since there is no benefit to Objectors to be gained from their Objection to my claim, I can only speculate that they hope to gain some kind of

advantage in state court from their Objection. But that is a matter for the state court, not this bankruptcy court.

Dated this 11th day of  
September, 2017

  
GEORGE PANDI

**From:** Eric Haley <ehaley@haley-law.com>

**Sent:** August 28, 2017 1:46 PM

**To:** george pandi

**Cc:** Stuart Rodgers

**Subject:** RE: BANKRUPTCY CASE : 2:16-bk-11585-SHG for Steve Pandi Eileen Quevada debtor

Mr. Pandi,

There is going to be a distribution to claims, but nothing is going to fall below the administrative claims level or that of the Internal Revenue Service's position. I have collected \$14,000.00 and am ready to disburse in the neighborhood of \$7,083.91.

This is in line for a Trustee final report to be submitted to the UST for review and eventual filing in the near future.

Regards,

Eric M. Haley, CFE

Law Office of Eric M. Haley

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